

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554**

In the Matter of)	
)	
Amendment of the Commission's)	RM-10784
Rules with Regard to WRC-2003)	
Changes)	
)	

To: The Commission

**COMMENTS of Nickolaus E. Leggett
N3NL Amateur Radio Operator**

The following is a set of comments from Nickolaus E. Leggett, an amateur radio operator (Extra Class licensee – call sign N3NL), inventor (U.S. Patents # 3,280,929 and 3,280,930 and one electronics invention patent application pending), and a certified electronics technician (ISCET and NARTE). I also have a Master of Arts degree in Political Science from the Johns Hopkins University (May 1970).

My comments are on the changes to the amateur radio Morse Code licensing requirements proposed by Dale E. Reich in his petition to the Commission. In his petition, Mr. Reich suggests that the Morse Code testing requirement be dropped from the amateur radio General Class license and be retained for the Extra Class license. In addition, he proposes that Technician Class licensees should be required to pass the General Class written exam before being allowed to upgrade to General Class.

In my opinion, a role for Morse Code should be retained within the amateur radio licensing system despite the recent change in the international regulations which dropped any mandatory requirement for Morse Code knowledge. Some Morse Code capability should be retained in amateur radio for the reasons stated in the section, **Reasons for a**

Continued Role for Morse Code, provided later in this document (refer to page 2 below).

Morse Code in Amateur Radio Regulations

The Commission should take the following steps to make sure that Morse Code continues to have a constructive role in amateur radio operation:

1. The current sub-bands reserved for Morse Code and digital data communications should remain as they are.
2. The 5 words per minute Morse Code requirement should be retained for the Extra Class license exam as suggested by Mr. Reich.
3. Technician Class amateur radio operators should be granted Morse Code and digital data privileges equivalent to those held by Technician Plus operators as suggested by other petitioners.
4. Any person wishing to obtain amateur radio General Class privileges should be required to pass the General Class written exam as suggested by Mr. Reich.

Reasons for a Continued Role for Morse Code

There are several reasons why the retention of some role for Morse Code in amateur radio serves the national interest and enhances the public service roles of amateur radio:

1. Morse Code equipment is more affordable for amateur radio operators in third-world nations than voice mode (single side band) amateur radio equipment is. Robust Morse Code operations by Americans encourage these operators to participate in world-wide amateur radio.

2. Morse Code with the standard Q signals can be understood by operators who speak different languages. This enhances international amateur radio communications.
3. American amateur radio operators of limited means can afford to build or purchase low-power Morse Code equipment for the fairly low price of \$100 to \$200 as compared to the much higher prices for single side band amateur radio equipment.
4. Morse Code is inherently narrow-band in nature allowing numerous amateur radio stations to share a given allocated band of frequencies.
5. Morse Code stations are quite simple, encouraging amateur operators to get involved in analyzing, designing, and building their own equipment as well as modifying existing equipment.
6. Morse Code is effective at low power levels allowing greater frequency reuse. I have operated on the high frequencies using one Watt of output power and Morse Code.
7. Morse Code is valuable during megadisasters or other extreme conditions when amateur operators must improvise their own transmitting equipment. Attorney Donald J. Schellhardt in comments in docket RM-10412 first introduced the concept of a megadisaster. Schellhardt defines a megadisaster as “A life-threatening disaster, either natural or man-made, of sufficient intensity and scale that it: (a) destroys and/or disables much, most, or all of the basic infrastructure and services over an area of *at least* 10,000 square miles, for a period of *at least* weeks or months; and (b) prevents or significantly

restricts the flow of relief supplies and personnel, from areas which are not directly affected, for a period of *at least* two weeks.” (Comments of April 21, 2002). In a megadisaster, the operator can easily be isolated on his own and have to improvise radio communications. In such a situation it is much easier to create a keyed radio oscillator or even a keyed radio noise source than it is to create a single side band or FM transmitter. In addition, Morse Code can be used with a light, whistle, or car horn to provide local communications.

Recommended Action

The Commission should keep the 5 words per minute Morse Code requirement for the Extra Class license. In addition, the Morse Code and digital data sub-bands should be kept as they are now.

Respectfully submitted,

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